

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

PAULA KADIM  
Plaintiff,

v.

ADELPHIA and  
CIGNA GROUP INSURANCE  
and its affiliate Company LIFE  
INSURANCE COMPANY OF  
NORTH AMERICA  
Defendants.

**Civil Action No. 04 CV 12383**

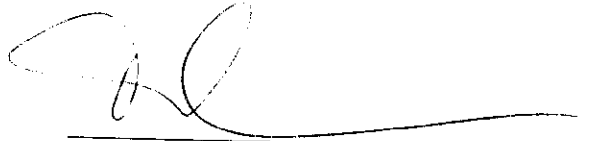
**DEFENDANTS' OPPOSITION TO PLAINTIFF'S  
MOTION OPPOSING REMOVAL**

NOW COME Defendant Cigna Group Insurance Company and its affiliate Life Insurance Company of North America ("LINA") and Defendant Adelpia ("Adelpia"), pursuant to Rule 7.1(b)(2) of Local Rules of United States District Court for the District of Massachusetts, and hereby request that this Court deny Plaintiff's Motion Opposing Removal to U.S. District Court (hereinafter "Motion to Remand"). As explained in the memorandum filed herewith, this Court must deny Plaintiff's Motion to Remand because this Court has proper jurisdiction over Plaintiff's claims.

Respectfully submitted,

DEFENDANTS ADELPHIA and  
CINGA GROUP INSURANCE and its  
affiliate LIFE INSURANCE COMPANY OF  
NORTH AMERICA,

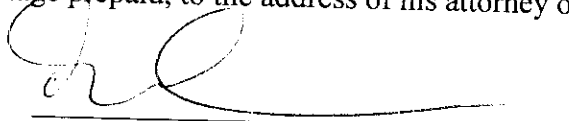
By their Attorney,



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CERTIFICATE OF SERVICE

I, David B. Crevier, hereby certify that I have served a copy of the foregoing on the plaintiff by mailing a copy, by first class mail, postage prepaid, to the address of his attorney of record, this 24<sup>th</sup> day of November, 2004.



David B. Crevier